

FILED

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U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

RAUL TORRES,

Defendant.

INFORMATION

CASE NO.

1:19 CR 390

Title 7, United States Code,
Sections 2156(a)(1) and (b);
Title 18, United States Code,
Sections 49, 1956(a)(3)(B),
1960(b)(1)(A), (B), and (C)

JUDGE NUGENT

COUNT 1

(Money Laundering, 18 U.S.C. § 1956(a)(3)(B))

The United States Attorney charges:

1. From on or about November 24, 2015 to on or about December 11, 2015, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant RAUL TORRES, with the intent to conceal and disguise the nature, location, source, ownership, and control of property believed to be the proceeds of a specified unlawful activity, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce involving property represented by a law enforcement officer and by another person at the direction and approval of a Federal official authorized to investigate and prosecute Title 18, United States Code, Section 1956 violations to be proceeds of a specified unlawful activity, to wit: conspiracy to distribute controlled substances in violation of Title 21, United States Code, Section 846, and distributing and possessing with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 18, United States Code, Section 1956(a)(3)(B).

COUNT 2

(Money Laundering, 18 U.S.C. § 1956(a)(3)(B))

The United States Attorney further charges:

2. From on or about March 24, 2016 to on or about April 25, 2016, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant RAUL TORRES, with the intent to conceal and disguise the nature, location, source, ownership, and control of property believed to be the proceeds of a specified unlawful activity, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce involving property represented by a law enforcement officer and by another person at the direction and approval of a Federal official authorized to investigate and prosecute Title 18, United States Code, Section 1956 violations to be proceeds of a specified unlawful activity, to wit: conspiracy to distribute controlled substances in violation of Title 21, United States Code, Section 846, and distributing and possessing with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 18, United States Code, Section 1956(a)(3)(B).

COUNT 3

(Money Laundering, 18 U.S.C. § 1956(a)(3)(B))

The United States Attorney further charges:

3. From on or about May 2, 2016 to on or about June 17, 2016, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant RAUL TORRES, with the intent to conceal and disguise the nature, location, source, ownership, and control of property believed to be the proceeds of a specified unlawful activity, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce involving property represented by a law enforcement officer and by another person at the direction and approval of a Federal

official authorized to investigate and prosecute Title 18, United States Code, Section 1956 violations to be proceeds of a specified unlawful activity, to wit: conspiracy to distribute controlled substances in violation of Title 21, United States Code, Section 846, and distributing and possessing with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 18, United States Code, Section 1956(a)(3)(B).

COUNT 4
(Money Laundering, 18 U.S.C. § 1956(a)(3)(B))

The United States Attorney further charges:

4. On or about July 5, 2018, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant RAUL TORRES, with the intent to conceal and disguise the nature, location, source, ownership, and control of property believed to be the proceeds of a specified unlawful activity, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce involving property represented by a law enforcement officer and by another person at the direction and approval of a Federal official authorized to investigate and prosecute Title 18, United States Code, Section 1956 violations to be proceeds of a specified unlawful activity, to wit: conspiracy to distribute controlled substances in violation of Title 21, United States Code, Section 846, and distributing and possessing with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 18, United States Code, Section 1956(a)(3)(B).

COUNT 5

(Operating an Unlicensed Money Transmitting Business, 18 U.S.C. § 1960)

The United States Attorney further charges:

5. From on or about January 1, 2011 to August 11, 2018, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant RAUL TORRES did knowingly conduct, control, manage, supervise, direct, and own an unlicensed money transmitting business affecting interstate and foreign commerce that (1) operated without an appropriate money transmitting license in Ohio, where such operation is punishable as a misdemeanor or felony under state law; (2) failed to comply with the money transmitting business registration requirements under Section 5330 of Title 31, United States Code, and the regulations thereunder; and (3) involved the transportation and transmission of funds that were known to Defendant to have been derived from a criminal offense and were intended to be used to promote and support unlawful activity, to wit: Defendant utilized his personal and business accounts and associated assets to engage in unlicensed money transmitting, in violation of Title 18, United States Code, Sections 1960(b)(1)(A), (B), and (C).

COUNT 6

(Sponsoring and Exhibiting Animals in Animal Fighting Venture, 7 U.S.C. § 2156(a)(1))

The United States Attorney further charges:

6. On or about July 7, 2018, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant RAUL TORRES did knowingly sponsor and exhibit an animal in an animal fighting venture, in and affecting interstate commerce, to wit: Defendant sponsored and exhibited fighting roosters in an animal fight located in Youngstown, Ohio, in violation of Title 7, United States Code, Section 2156(a)(1) and Title 18, United States Code, Section 49.

COUNT 7

(Sponsoring and Exhibiting Animals in Animal Fighting Venture, 7 U.S.C. § 2156(a)(1))

The United States Attorney further charges:

7. On or about August 11, 2018, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant RAUL TORRES did knowingly sponsor and exhibit an animal in an animal fighting venture, in and affecting interstate commerce, to wit: Defendant sponsored and exhibited fighting roosters in an animal fight located in Youngstown, Ohio, in violation of Title 7, United States Code, Section 2156(a)(1) and Title 18, United States Code, Section 49.

COUNT 8

(Possessing and Training Animals for Animal Fighting Ventures, 7 U.S.C. § 2156(b))

The United States Attorney further charges:

8. On or about August 11, 2018, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant RAUL TORRES did knowingly possess and train animals for purpose of having the animals participate in an animal fighting venture, in and affecting interstate commerce, to wit: Defendant maintained, possessed, and trained numerous fighting roosters in a premises he controlled on Denison Avenue in Cleveland, Ohio, for the purpose of using them thereafter in animal fighting ventures, in violation of Title 7, United States Code, Section 2156(b) and Title 18, United States Code, Section 49.

COUNT 9

(Possessing and Training Animals for Animal Fighting Ventures, 7 U.S.C. § 2156(b))

The United States Attorney further charges:

9. On or about August 11, 2018, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant RAUL TORRES did knowingly possess and train animals for purpose of having the animals participate in an animal fighting venture, in and affecting interstate commerce, to wit: Defendant maintained, possessed, and trained numerous fighting roosters in a

premises he controlled on West 38th Street in Cleveland, Ohio, for the purpose of using them thereafter in animal fighting ventures, in violation of Title 7, United States Code, Section 2156(b) and Title 18, United States Code, Section 49.

FORFEITURE

The United States Attorney further charges:

1. The allegations of Counts 1, 2, 3, 4, and 5, are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 982. As a result of the foregoing offenses, defendant RAUL TORRES shall forfeit to the United States any and all property, real or personal, involved in such offense, or any property traceable to such property; including, but not limited to, the following:

- a. \$42,605.01 seized from JP Morgan Chase Bank Account #xxxxx0987; and
- b. A money judgement in the amount of \$1,037,086.00.

SUBSTITUTE PROPERTY

In the event that any property subject to forfeiture under 18 U.S.C. 982, as a result of any act or omission of the defendant:

- a.) cannot be located upon exercise of due diligence;
- b.) has been transferred or sold to, or deposited with a third party;
- c.) has been placed beyond the jurisdiction of this Court;
- d.) has been substantially diminished in value; or,
- e.) has been commingled with other property which cannot be divided without difficulty.

It is the intent of the United States, pursuant to 21 U.S.C. § 853(p) [as incorporated by 18 U.S.C. § 982(b)(1)], to seek forfeiture of any other property of the defendant(s), up to an amount equivalent to the value of the forfeitable property described above.

JUSTIN E. HERDMAN
United States Attorney

By: 

Robert F. Corts, Chief
OCDETF Unit